

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION**

**JACOB DOE**

**Plaintiff,**

**v.**

**No. 1:23-cv-00041**

**THE UNIVERSITY OF NORTH  
CAROLINA SYSTEM, et al.**

**Defendants.**

**ACLU OF NORTH CAROLINA LEGAL FOUNDATION'S AND  
FREEDOM OF THE PRESS FOUNDATION'S MOTION FOR  
LEAVE TO SUBMIT *AMICI CURIAE* BRIEF OPPOSING  
PLAINTIFF'S MOTION FOR A TEMPORARY RESTRAINING  
ORDER AND PRELIMINARY INJUNCTION**

The American Civil Liberties Union of North Carolina Legal Foundation (ACLU-NCLF) and Freedom of the Press Foundation (FPF) respectfully move for leave to file the attached *amici* brief opposing Plaintiff Jacob Doe's Motion for a Temporary Restraining Order and Preliminary Injunction (ECF 49). For the reasons stated in their contemporaneously filed supporting memorandum of law, *Amici* request that this Court grant them leave to file the attached brief and consider

the brief's arguments when deciding whether to grant Plaintiff's Motion for a Temporary Restraining Order and Preliminary Injunction.

Pursuant to LCvR 7.1(b), proposed amicus informed counsel for the parties of their intent to file this motion on the morning of October 9, 2023. As of this filing, Defendants have informed *Amici* that they do not oppose this motion. Plaintiff has yet to state his position on *Amici's* motion.

Respectfully submitted this 9th day of October 2023 by:

**ACLU OF NORTH  
CAROLINA LEGAL  
FOUNDATION**

/s/ Kristi L. Graunke\*

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NCLF and Freedom of the Press  
Foundation*

*\*Counsel of record*

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was on this day filed in in the Western District of North Carolina using the Clerk's CM/ECF system, which will send notification of this filing to counsel for the parties.

Signed this 9<sup>th</sup> day of October, 2023

/s/ Kristi Graunke